

U.S. Department of Justice

Washington, DC 20530

Exhibit A to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .22 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant Rawlings International Advisory Group, LLC	2. Registration Number 7011
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3. Primary Address of Registrant 18 Orchard Way South, Potomac, MD 20854

4. Name of Foreign Principal Khalifa Haftar	5. Address of Foreign Principal Alrajma Camp Benghazi LIBYA
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6. Country/Region Represented LIBYA

7. Indicate whether the foreign principal is one of the following: <input type="checkbox"/> Government of a foreign country ¹ <input type="checkbox"/> Foreign political party <input type="checkbox"/> Foreign or domestic organization: If either, check one of the following: <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation <input type="checkbox"/> Association <input type="checkbox"/> Committee <input type="checkbox"/> Voluntary group <input type="checkbox"/> Other (<i>specify</i>) _____ <input checked="" type="checkbox"/> Individual-State nationality LIBYA

8. If the foreign principal is a foreign government, state: a) Branch or agency represented by the registrant b) Name and title of official with whom registrant engages

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

9. If the foreign principal is a foreign political party, state:

- a) Name and title of official with whom registrant engages
- b) Aim, mission or objective of foreign political party

10. If the foreign principal is not a foreign government or a foreign political party:

- a) State the nature of the business or activity of this foreign principal.

Khalifa Haftar

- b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Owned by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Directed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Controlled by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Financed by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

11. Explain fully all items answered "Yes" in Item 10(b).

12. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

09/04/2021Michael D. Laba/s/Michael D. Laba

EXECUTION

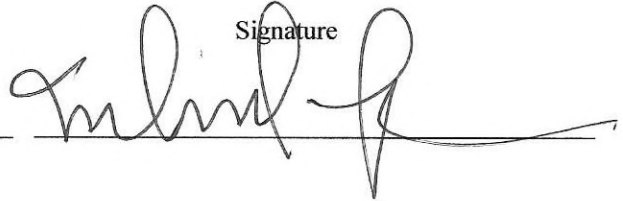
In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

09/04/2021 Michael D. Laba



U.S. Department of Justice

Washington, DC 20530

Exhibit B to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

Rawlings International Advisory Group, LLC

2. Registration Number

7011

3. Name of Foreign Principal

Khalifa Haftar

Check Appropriate Box:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. What is the date of the contract or agreement with the foreign principal? 08/24/2021
8. Describe fully the nature and method of performance of the above indicated agreement or understanding.

See attached consultancy agreement.

9. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

See attached consultancy agreement.

10. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act¹.

Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Anticipated activities on behalf of the foreign principal will include lobbying; the planning and execution of a visit to Washington, DC by the foreign principal; introducing the foreign principal to influential policymakers and opinion leaders in the Executive branch, Congress, think tanks, and NGOs; and preparing background material for use in making those introductions.

11. Prior to the date of registration² for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal?

Yes ☐ No ☒

If yes, describe in full detail all such activities. The response should include, among other things, the relations, interests, and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored, or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers, and subject matter. The response must also include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's activities, including political activities.

Set forth below in the required detail the registrant's political activities.

Date	Contact	Method	Purpose
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12. During the period beginning 60 days prior to the obligation to register³ for this foreign principal, has the registrant received from the foreign principal, or from any other source, for or in the interests of the foreign principal, any contributions, income, money, or thing of value either as compensation, or for disbursement, or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail an account of such monies or things of value.

Date Received	From Whom	Purpose	Amount/Thing of Value
08/25/2021	Marwa Boughanmi	Payment pursuant to the engagement agreement between The Livingston Group and Lanny J. Davis & Associates and Khalifa Haftar.	\$ 160,000.00

\$ 160,000.00

13. During the period beginning 60 days prior to the obligation to register⁴ for this foreign principal, has the registrant disbursed or expended monies in connection with activity on behalf of the foreign principal or transmitted monies to the foreign principal?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately an account of such monies, including monies transmitted, if any.

Date	Recipient	Purpose	Amount
See Appendix for Response			

¹ "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

^{2,3,4} Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

09/04/2021

Michael D. Laba

/s/Michael D. Laba

EXECUTION

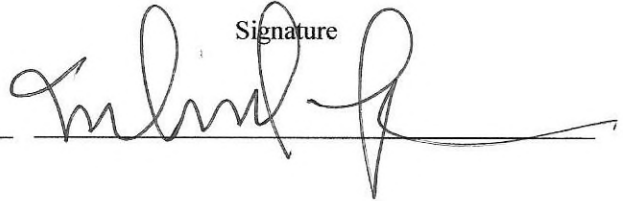
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Date

Printed Name

Signature

09/04/2021 Michael D. Laba



Appendix

Response to Item 13

Item 13: During the period beginning 60 days prior to the obligation to register for this foreign principal, has the registrant disbursed or expended monies in connection with activity on behalf of the foreign principal or transmitted monies to the foreign principal? If yes, set forth below in the required detail and separately an account of such monies, including monies transmitted, if any.

Date	Recipient	Purpose	Amount
08/26/2021	The Livingston Group	Pursuant to the agreement between The Livingston Group and Lanny J. Davis & Associates and Khalifa Haftar.	\$ 40,000.00
08/26/2021	Lanny J. Davis & Associates	Pursuant to the agreement between The Livingston Group and Lanny J. Davis & Associates and Khalifa Haftar.	\$ 40,000.00
08/26/2021	Intrepid Investment Services International	Pursuant to the agreement between The Livingston Group and Lanny J. Davis & Associates and Khalifa Haftar.	\$ 40,000.00
08/25/2021	Rawlings International Advisory Group	Disbursement pursuant to the consultancy agreement between The Livingston Group and Lanny J. Davis and Rawlings International Advisory Group.	\$ 40,000.00



August 24, 2021

PRIVATE AND CONFIDENTIAL

Michael D. Laba
Managing Director
Rawlings International Advisory Group LLC
18 Orchard Way South, Potomac, MD 20854

Submitted via email: mlaba@rawlingsadvisory.com

Dear Mr. Laba:

Pursuant to the discussions to date, we are submitting for your approval terms of a consultancy agreement between Rawlings International Advisory Group LLC ("Rawlings") and the firms of Lanny J. Davis & Associates ("Davis") and The Livingston Group ("Livingston") ("the Davis-Livingston Team"). The terms of the agreement are as follows:

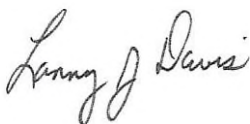
- On August 24, 2021, the Davis-Livingston Team submitted an engagement agreement to Field Marshal Kalifa Haftar ("Client") for government relations representation and counsel in Washington, DC. Rawlings initiated the agreement with the Davis-Livingston Team on behalf of the Client, who is seeking an initial short-term representation in Washington, DC.
- As Managing Director of Rawlings, Michael D. Laba will work in coordination with the Davis-Livingston Team and serve as a liaison with the Client and Client representatives. He will provide strategic counsel and support for the high level visit and, if agreed to, the ongoing representation.
- Rawlings will bill the Davis-Livingston Team at a rate of \$400 per hour up to a maximum of 100 hours per month even if additional hours are worked. This fee will be paid for the period of six (6) months as set forth in the engagement agreement between the Client and Davis-Livingston. If the agreement is extended, the same arrangement will apply unless otherwise agreed.
- Rawlings will serve as paymaster for all fees to be paid by the Client to the Davis-Livingston Team and will disburse said funds in accordance with the Client's engagement agreement with the Davis-Livingston Team and the consultancy agreement between the Davis-Livingston Team and Rawlings.

- All out-of-pocket expenses initiated by Rawlings in support of the Client engagement must be pre-cleared by the Davis-Livingston Team and the Client, and documented with receipts. Out-of-pocket expenses will be paid once the Davis-Livingston Team is reimbursed by the Client.
- Rawlings agrees to abide by every applicable law and regulation covering government contracts for lobbying, including under the Foreign Agents Registration Act (FARA), during the implementation of the consultancy agreement and the overall engagement agreement with the Client.
- As an independent contractor, Rawlings has no authority to bind the Davis-Livingston Team in any manner whatsoever, absent the express written consent of the Davis-Livingston Team. Rawlings shall be solely responsible for the acts of its employees and/or agents and shall defend and hold the Davis-Livingston Team harmless from any claims which arise from said acts.
- In turn, the Davis-Livingston Team is not authorized to bind Rawlings in any matter whatsoever, absent the express written consent of Rawlings. The Davis-Livingston Team shall be solely responsible for the acts of its employees and/or agents and shall defend and hold Rawlings harmless from any claims which arise from said acts.

Upon approval of the consultancy agreement, please return a signed copy.

We look forward to advancing our working relationship with you and to providing government relations representation and counsel to the Client in Washington, DC.

Sincerely,

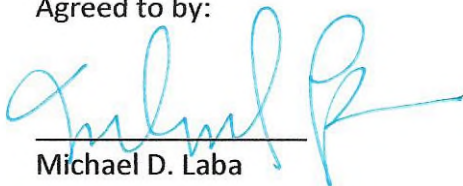


Lanny J. Davis
Lanny J. Davis & Associates



Robert L. Livingston
The Livingston Group

Agreed to by:



Michael D. Laba
Managing Director
Rawlings International Advisory Group LLC

08/24/2021
(Date)